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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,
Plaintiff,
vs.
SHAWN NEWKIRK,
Defendant.

2:10-cr-547-RLH-PAL-27

**STIPULATION TO EXTEND
DEADLINES IN THIS COURT'S JULY 2,
2015 ORDER BY
FORTY-FIVE (45) DAYS**

17 The United States of America, by Assistant United States Attorney Elizabeth Olson White,
18 and Defendant Shawn Newkirk, by Assistant Federal Public Defender Nisha Brooks-Whittington,
19 submit the following Joint Stipulation to extend, by forty-five (45) days, all of the deadlines set in
20 this Court's Order dated July 2, 2015. *See* CR 935.

21 The parties agree and stipulate to the following:

22 1. On November 13, 2012, this Court sentenced Defendant to 48 months' imprisonment
23 on his conviction for drug-related offenses. CR 722.

24 2. On February 27, 2015, Defendant filed a *pro se* motion for a reduction of sentence
25 pursuant to 18 U.S.C. § 3582(c)(2) in light of Guidelines Amendment 782. CR 906.

26 3. On March 3, 2015, this Court issued an Order appointing the Federal Public Defender
27 to represent Defendant, and setting deadlines. Specifically, the Court ordered the Probation Office
28 to provide certain documents to the parties within 30 days (i.e., by April 2, 2015) and ordered the

1 Federal Public Defender to file any appropriate motion or stipulation within 120 days (i.e., by July
2 1, 2015). CR 907.

3 4. On July 1, 2015, the parties filed a joint stipulation to extend the deadlines in this
4 Court's March 3, 2015 Order by 30 days. CR 933. On July 2, 2015, the Court granted the
5 stipulation. CR 935.

6 5. Defense counsel ordered the sentencing transcript in this case. The parties anticipate
7 receiving the sentencing transcript soon. The parties are seeking an additional forty-five (45) days
8 to obtain and then review the sentencing transcript to determine the guideline calculations.

9 6. For the reasons stated above, the parties respectfully request the Court issue an order
10 extending the deadlines in the Court's July 2, 2015 Order, by forty-five (45) days.

11 DATED this 28th day of July, 2015.

12 Respectfully submitted,

14 RENE L. VALLADARES
15 Federal Public Defender

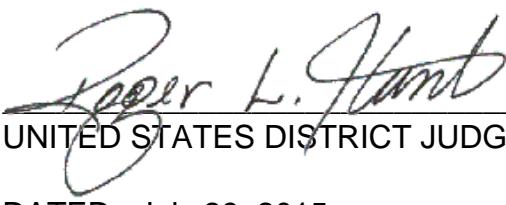
16 */s/ Nisha Brooks-Whittington*

17 _____
18 NISHA BROOKS-WHITTINGTON,
19 Assistant Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Elizabeth O. White

ELIZABETH O. WHITE,
Appellate Chief and
Assistant United States Attorney

20 IT IS SO ORDERED.
21 
22 _____
23 UNITED STATES DISTRICT JUDGE

24 DATED: July 29, 2015
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